

EXHIBIT 1

DECLARATION OF JANESSA GOLDBECK

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

REPUBLICAN NATIONAL COMMITTEE;
NEVADA REPUBLICAN PARTY; DONALD
J. TRUMP FOR PRESIDENT 2024, INC.; and
DONALD J. SZYMANSKI,

Plaintiffs,

v.

CARI-ANN BURGESS, *in her official
capacity as the Washoe County Registrar of
Voters*; JAN GALASSINI, *in her official
capacity as the Washoe County Clerk*;
LORENA PORTILLO, *in her official capacity
as the Clark County Registrar of Voters*;
LYNN MARIE GOYA, *in her official capacity
as the Clark County Clerk*; FRANCISCO
AGUILAR, *in his official capacity as Nevada
Secretary of State*,

Defendants.

Case No. 3:24-cv-00198-MMD-CLB

**DECLARATION OF JANESEA
GOLDBECK**

I, Janessa Goldbeck, under penalty of perjury, hereby declare as follows:

1. I am over the age of 18, have personal knowledge of the facts below, and can competently testify to their truth.

2. My name is Janessa Goldbeck and I am currently the Chief Executive Officer (“CEO”) at Vet Voice Foundation (“Vet Voice”) where I have worked for over two years.

3. Vet Voice is a national non-profit, non-partisan organization, founded in 2009 that is organized under Section 501(c)(3) of the Internal Revenue Code of 1986, as amended, for charitable and educational purposes.

4. As CEO, my responsibilities include managing and overseeing personnel, as well as the operations and funding of programs, dedicated to serving over 1.5 million subscribers across the country, composed mainly of active-duty military members, veterans, and their families. These subscribers are individuals who have taken affirmative steps to become a recipient of communications from Vet Voice. Vet Voice has over 14,000 subscribers in Nevada.

5. In addition to serving its affirmative subscribers, Vet Voice is dedicated to empowering veterans across the country to become civic leaders and policy advocates by providing the support, training, and tools they need to face public-policy issues at home, such as voting rights and combating disinformation, as well as other policy areas like environment, health care, jobs, and more. Increasing turnout among veterans and military voters—and ensuring that their ballots are counted when they do turn out—is critical to this mission.

6. As a nonpartisan organization, Vet Voice works to increase turnout of not just its affirmative subscribers but the broader veteran and military community, and it does so regardless of any individual voter's political beliefs or party membership. To advance this goal, Vet Voice has built a first-of-its-kind military voter file containing approximately 14 million records of veterans and military family members, including over 120,000 records for voters in Nevada, to help the organization focus its mobilization, education, and turnout efforts. These voters comprise the other component of Vet Voice's constituency.

7. Prior to my time as CEO of Vet Voice, I served for seven years as a commissioned combat engineer officer in the U.S. Marine Corps. I left the Marines in 2019 with the rank of captain. During my time in military service, I deployed to military installations throughout the United States as well as to various countries in Europe in support of NATO operations. I also performed many collateral duties while serving, including acting as my unit's Voting Assistance Officer at one point in my career.

8. Vet Voice's subscribers and constituents include active-duty servicemembers and their families who are oftentimes stationed away from their home state. It is oftentimes physically impossible for these voters to appear at the polls in their home state on election day, and thus they are highly reliant on voting by mail to exercise their right to vote. According to the Federal Voting Assistance Program, approximately three-quarters of the nation's 1.4 million active-duty military members are eligible to vote absentee or by mail because they are stationed away from their home state.¹

¹ State of the Military Voter (Federal Voting Assistance Program), <https://www.fvap.gov/info/reports-surveys/StateoftheMilitaryVoter>.

1 9. Vet Voice’s subscribers and constituents also include veterans, many of whom are
2 seniors or suffer from physical disabilities, often connected to their military service. Indeed,
3 according to the Bureau of Labor Statistics reported in March 2023, 27 percent of all veterans have
4 a service-connected disability, including 41 percent of veterans who have served since September
5 2001.² Older veterans and disabled veterans are also highly reliant on mail voting to exercise the
6 franchise, given the obstacles they face with appearing in person to vote at their polling location.

7 10. Federal data shows that active military members are registered to vote, and actually
8 successfully cast a ballot, at significantly lower rates than civilians. In the 2020 presidential
9 election, only 47 percent of active military members voted, compared to the national rate of 74
10 percent.³ The gap is typically even starker when it comes to military members deployed overseas.
11 These disparate rates in registration and turnout have been traced to unique obstacles that active
12 military members face in accessing the voting system, many of which include the difficulties these
13 voters face in receiving mail ballots in time to vote them, and getting them returned to election
14 officials in time for them to be counted.

15 11. I have both personal and professional familiarity with the difficulties that arise with
16 voting as an active military member. For example, during the 2012 election cycle, I participated
17 in an officer candidate school for ten weeks at Marine Corps Base Quantico, during which time
18 we were not allowed to leave the premises. My only option for participating in the election was to
19 vote absentee. However, I did not have access to a phone or the internet and thus could not confirm
20 if or when my ballot had been mailed out or received by my state election officials; I had to take
21 it on faith that it was delivered on time through the mail. My experience is a common one in the
22 military.

23 12. I also know that many deployed military members may not have direct or consistent
24 access to postal services or be able to receive mail addressed to them on a daily basis, such as when
25 they are deployed to combat zones or on ships or submarines. This means that military voters may
26 only have limited opportunities to mail their ballots back and will oftentimes have limited

27 ² Employment Situation of Veterans – 2022, <https://www.bls.gov/news.release/pdf/vet.pdf>.

28 ³ State of the Military Voter (Federal Voting Assistance Program), <https://www.fvap.gov/info/reports-surveys/StateoftheMilitaryVoter>.

1 opportunities, or no opportunity at all, to cure deficiencies or other issues with their ballots to
2 ensure their vote will be counted in time.

3 13. Vet Voice is committed to improving military and veteran voter turnout and
4 believes that growing the “veteran vote” benefits all Americans by engaging those who have served
5 their country in the civic process.

6 14. Accordingly, a key part of Vet Voice’s mission is to mobilize its subscribers and
7 constituency of military voters and their families generally by giving them the knowledge and tools
8 to successfully participate in elections, especially when they face unique challenges due to being
9 deployed away from home. Vet Voice dedicates significant resources, including money, personnel
10 time, and volunteers, to these voter education and mobilization efforts.

11 15. Vet Voice’s military voter file is critical to the organization’s activities in
12 specifically targeting and reaching military voters at an unprecedented scale. For example, in the
13 2020 election, Vet Voice volunteers sent 2.5 million texts to approximately 1.5 million veterans
14 and military families, resulting in a significant increase in voter participation among those
15 contacted. In 2022, Vet Voice volunteers targeted its text message campaign toward Nevada voters
16 in its military voter file. When engaged by a Vet Voice volunteer, voters in the lowest 40 percent
17 turnout propensity were three times more likely to vote early or by mail than peers who were not
18 contacted.

19 16. Vet Voice is continuing to expand this military voter file as part of its growing
20 efforts to mobilize the military and veteran community, including in Nevada. We are currently in
21 the process of planning our voter engagement and education efforts for the 2024 election and
22 expect to significantly build upon our success from the 2020 and 2022 election cycles.

23 17. Because of its high population of military and veteran voters, Nevada is a key
24 priority state for Vet Voice. According to Vet Voice’s military voter file, Nevada is the state with
25 the 7th highest population of veterans and is 22nd in terms of active-duty military. Combined,
26 those demographics make Nevada a top target for veteran and military-affiliated voters.

27 18. At this time, Vet Voice has identified and plans to target approximately 10,000
28 individual veteran and military-affiliated voters in Nevada to mobilize them to vote in the 2024

1 elections using direct mail and text messages. That number may change, however, depending on
2 Vet Voice's resources. Vet Voice also currently has staff on the ground in Nevada.

3 19. Vet Voice also engages in more traditional forms of voter engagement to educate
4 voters. This includes direct mailing efforts to inform voters about important voting deadlines,
5 including deadlines to return mail ballots. Vet Voice volunteers also conduct phone banking
6 operations to transmit information about voting to other military voters. Vet Voice also places
7 digital advertising on social media and video platforms to further promote its message and mission.
8 Finally, Vet Voice may advertise on rural radio stations to reach active-duty and military
9 constituents on issues of importance.

10 20. Because the constituents and subscribers we serve are so dependent on voting by
11 mail, a large part of Vet Voice's voter education mission and programming efforts—whether
12 through our voter file or more traditional means—focus on mail voting. This is true in Nevada as
13 well as in other states across the country.

14 21. Vet Voice is currently planning its outreach strategy in Nevada for the upcoming
15 2024 election. A key component of that strategy is understanding the legal landscape to ensure
16 voters have the correct information to vote. This includes giving Nevada constituents information
17 about their eligibility to vote by mail; how to apply for a mail ballot; how to properly complete a
18 mail ballot; as well as educating voters about the state's deadlines for counting mail ballots,
19 including the current requirement set forth in Nevada law that ballots be postmarked and received
20 by their local election office no later than four days after election day (or, if not postmarked, three
21 days after election day). Laws like these, which give timely-voted ballots more time to make their
22 way back to election officials to be counted, help enfranchise Vet Voice's constituents, who are
23 uniquely vulnerable to and more likely to be disenfranchised by strict election-day receipt cut-offs
24 for mail ballots. Understanding and being able to properly educate our constituents on the specific
25 legal landscape in which their ballots will be cast and counted is critical to our mission.

26 22. Vet Voice believes the claims that Plaintiffs make in this lawsuit and their request
27 for relief—specifically, to require Nevada to reject all mail ballots received in the mail after
28 election day, even if postmarked by or even before election day—are a severe threat to the ability

1 of Vet Voice’s subscribers and constituents to vote in Nevada, as well as to Vet Voice’s ability to
2 carry out an effective voter engagement and mobilization effort in the state. Plaintiffs’ claims seek
3 to toss out lawfully and timely cast ballots because they happen to arrive shortly after election day.
4 This threatens to disenfranchise, in particular, several different groups within Vet Voice’s core
5 constituencies, including: actively deployed military voters, who heavily rely on mail voting and
6 often must return their ballots from distant and inaccessible locations with unreliable mail service;
7 active military and their voters currently living outside of their home state, whose ballots often
8 take longer to reach them and to get back to their home state to be counted; as well as senior
9 veterans and physically disabled veterans, many of whom rely on mail voting to vote in Nevada,
10 but whose ballots are at risk of being thrown out because of minor mail delays. In all of these ways,
11 this lawsuit directly threatens Vet Voice’s mission of ensuring that military and veteran voters,
12 including in Nevada, have maximal flexibility and opportunity to vote under their states’ laws, and
13 have their ballots counted—and not rejected—for reasons largely out of their control.

14 23. For all of these reasons, Vet Voice has a strong interest in defending Nevada’s
15 current mail ballot receipt deadline, which allows ballots returned by mail voters a few days of
16 leeway in case there are unforeseen and unpreventable mail delays—a common occurrence for
17 military voters, who have no control over how long it will take for their ballots to be transmitted
18 back to election officials in Nevada.

19 24. Vet Voice is also concerned that if this effort is successful in Nevada, it will soon
20 be repeated in other states, many of which have extended ballot-receipt deadlines, harming
21 millions of military and veteran voters across the country and burdening Vet Voice’s efforts to
22 increase the military vote. Indeed, this is the second such case brought by one of the same plaintiffs
23 in the last few months. Vet Voice intervened in that case, which was brought in Mississippi, as
24 well. This case is just as critical to Vet Voice’s mission, and perhaps even more so given Nevada’s
25 larger veteran population share and greater reliance on mail voting than Mississippi.

26 25. Given the importance of mail voting to its subscribers and constituents, Vet Voice
27 has previously participated in litigation to protect the ability to effectively cast a ballot by mail.
28 Specifically, Vet Voice has filed challenges in Washington and Colorado to mail-ballot signature

1 matching requirements that increase the risk that a military voter's ballot will be rejected due to
2 inherent flaws with signature matching systems. *Vet Voice Foundation, et al. v. Secretary of State*
3 *Hobbs et al.*, No. 22-2-19384-1 SEA (Wash. Sup. Ct. King Cnty 2022); *Vet Voice Foundation, et*
4 *al. v. Secretary of State Griswold*, No. 2022CV334566, (Colo. District Ct. 2022). Vet Voice has
5 also intervened in ongoing federal court litigation in Mississippi raising a challenge to that state's
6 mail ballot deadline that is similar to the challenge made by plaintiffs in this case. *See Republican*
7 *Nat'l Comm. v. Wetzel*, No. 1:24-cv-25-LG-RPM, 2024 WL 988383, at *1 (S.D. Miss. Mar. 7,
8 2024). These efforts reflect our commitment to ensuring that all military voters across the country
9 can access the franchise through fair mail balloting rules.

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11 I certify under penalty of perjury that the foregoing is true and correct.

12 Executed on 5/10/2024
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14 By: Janessa Goldbeck
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16 Janessa Goldbeck
17 Chief Executive Officer
18 Vet Voice Foundation
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